

**SEALED**

BY ORDER OF THE COURT

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

OCT 20 2004

at 1 o'clock and 40 min. P. M.  
WALTER A.Y.H. CHINN, CLERK

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
PAUL O. JENKINS, (01) )  
DEBORAH D. JENKINS, (02) )  
 )  
Defendants. )  
 )

CR. NO. **CR04-00408 SOM**

INDICTMENT

[18 U.S.C. § 371,  
1028(a)(7), 1344,  
and 2]

INDICTMENT

The Grand Jury charges:

COUNT ONE

1. From in or about August 2001, up to and including  
in or about June 2004, in the District of Hawaii, PAUL O. JENKINS  
and DEBORAH D. JENKINS, the defendants, and others known and  
unknown to the grand jury, unlawfully, willfully and knowingly,

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did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 1028 and 1344 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that PAUL O. JENKINS and DEBORAH D. JENKINS, the defendants, and others known and unknown to the grand jury, knowingly used, in and affecting interstate commerce, without lawful authority, one or more means of identification of another person with the intent to commit, and to aid or abet, unlawful activity that constitutes a violation of Federal law, or that constitutes a felony under any applicable State or local law, in violation of Title 18, United States Code, Section 1028(a)(7).

3. It was a further part and object of the conspiracy that PAUL O. JENKINS and DEBORAH D. JENKINS, the defendants, and others known and unknown to the grand jury, unlawfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

a. In or about December 2001, PAUL O. JENKINS, while registered as a student at the University of Hawaii, submitted, or caused to be submitted, an "Education Loan Application and Promissory Note" to Wells Fargo Bank in Sioux Falls, South Dakota, which application fraudulently contained the name, social security number, and birthdate of another individual.

b. In or about January 2002, PAUL O. JENKINS, while registered as a student at the University of Hawaii, submitted, or caused to be submitted, a "Nellie Mae" Loan Application to State Street Bank and Trust Company in Braintree, Massachusetts, which application fraudulently contained the name, social security number, and birthdate of another individual.

c. In or about February 2002, DEBORAH D. JENKINS, while registered as a student at the University of Hawaii, submitted, or caused to be submitted, a "Nellie Mae" Loan Application to State Street Bank and Trust Company in Braintree, Massachusetts, which application fraudulently contained the name, social security number, and birthdate of another individual.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

5. In or about December 2001, in the District of Hawaii and elsewhere, PAUL O. JENKINS, the defendant, did knowingly use, in and affecting interstate commerce, without lawful authority, one or more means of identification of another person, to wit, the name, social security number, and birthdate of that person, with the intent to commit unlawful activity that constitutes a violation of Federal law, to wit, executing and attempting to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT THREE

6. In or about January 2002, in the District of Hawaii and elsewhere, PAUL O. JENKINS, the defendant, did knowingly use, in and affecting interstate commerce, without lawful authority, one or more means of identification of another person, to wit,

the name, social security number, and birthdate of that person, with the intent to commit unlawful activity that constitutes a violation of Federal law, to wit, executing and attempting to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, and by such conduct PAUL O. JENKINS obtained items of value aggregating \$1,000 or more during a one-year period.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), and 2.

COUNT FOUR

7. In or about February 2002, in the District of Hawaii and elsewhere, DEBORAH D. JENKINS, the defendant, did knowingly use, in and affecting interstate commerce, without lawful authority, one or more means of identification of another person, to wit, the name, social security number, and birthdate of that person, with the intent to commit unlawful activity that constitutes a violation of Federal law, to wit, executing and attempting to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the

custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, and by such conduct DEBORAH D. JENKINS obtained items of value aggregating \$1,000 or more during a one-year period.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1)(D), and 2.

COUNT FIVE

8. In or about December 2001, in the District of Hawaii and elsewhere, PAUL O. JENKINS, the defendant, unlawfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, to wit, PAUL O. JENKINS, the defendant, submitted a student loan application that fraudulently contained the name, social security number, and birthdate of another individual.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SIX

9. In or about January 2002, in the District of Hawaii and elsewhere, PAUL O. JENKINS, the defendant, unlawfully

and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, to wit, PAUL O. JENKINS, the defendant, submitted a student loan application that fraudulently contained the name, social security number, and birthdate of another individual.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SEVEN

10. In or about February 2002, in the District of Hawaii and elsewhere, DEBORAH D. JENKINS, the defendant, unlawfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution by means of material false and fraudulent pretenses, representations, and promises, to wit, DEBORAH D. JENKINS, the defendant, submitted a student loan application that fraudulently contained the name, social security number, and

birthdate of another individual.

All in violation of Title 18, United States Code,  
Sections 1344 and 2.

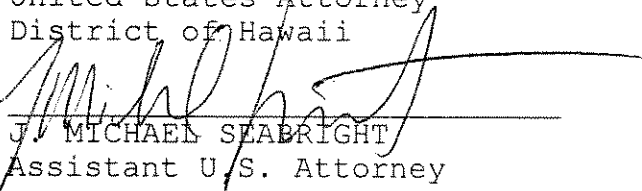
DATED: October 20, 2004, at Honolulu, Hawaii.

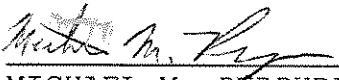
A TRUE BILL

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FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.  
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USA v. PAUL O. JENKINS, et al.  
Cr. No. \_\_\_\_\_; "Indictment"